

# Exhibit E

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

WAYMO LLC,  
Plaintiff,

vs.

No. 3:17-CV-00939-WHA

UBER TECHNOLOGIES, INC.;  
OTTOMOTTO LLC; OTTO TRUCKING,  
INC.,  
Defendants.

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HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY  
VIDEO-RECORDED DEPOSITION OF CHRIS URMSON  
Palo Alto, California  
August 24, 2017

Reported by:  
KENNETH T. BRILL  
CSR NO. 12797  
Job No. 2678939-A

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1 read in the press. 03:01:59

2 Q. Okay. Are there employees at Aurora who 03:02:01

3 were formerly at Tyto LiDAR or Odin Wave? 03:02:04

4 MR. SINGER: Hold on. That question is 03:02:09

5 not allowed. The only questions allowed of Aurora, 03:02:10

6 period, are how many Waymo employees they've hired 03:02:13

7 and if they told Mr. Urmson their reasons for 03:02:17

8 leaving, what they said. 03:02:21

9 BY MR. LIN: 03:02:26

10 Q. Okay. I'll strike that question. 03:02:30

11 And just to move on to one last thing I -- 03:02:38

12 small topic I was hoping that maybe we can discuss, 03:02:43

13 have you heard of the name Seval Oz? 03:02:47

14 A. Seval? 03:02:54

15 Q. Yes, Seval. I apologize. 03:02:55

16 A. Yes. 03:02:57

17 Q. Who is Seval Oz? 03:02:58

18 MR. SINGER: Is that an Aurora employee? 03:03:01

19 THE WITNESS: This is not an Aurora 03:03:03

20 employee. 03:03:06

21 MR. SINGER: Okay. 03:03:07

22 THE WITNESS: No. No, no. 03:03:08

23 She's the sister of Dr. Oz and a former 03:03:09

24 Google self-driving car company employee, and she 03:03:15

25 had some role with a Continental business unit. 03:03:20

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1	BY MR. LIN:	03:03:24
2	Q. What is the Continental business unit?	03:03:25
3	A. They're a tier one automotive supplier,	03:03:28
4	Continental. They had a business unit, I think it	03:03:31
5	was connected cars.	03:03:33
6	Q. And she's no longer with Google?	03:03:35
7	A. No, she's no longer with Google.	03:03:37
8	Q. Do you know where she is now?	03:03:40
9	A. The last I knew she was at Continental. I	03:03:41
10	think somebody sent me a reference request that she	03:03:44
11	may be raising money for a new start-up. I don't	03:03:48
12	know.	03:03:51
13	Q. Okay. Do you know whether or not if	03:03:51
14	Anthony Levandowski had solicited Seval Oz to leave	03:03:54
15	Google?	03:04:00
16	A. I have no idea.	03:04:01
17	Q. Okay. Do you know that Seval Oz was given	03:04:02
18	printed circuit board earrings when she left Google?	03:04:07
19	MR. SINGER: Objection, form.	03:04:12
20	Printed circuit what?	03:04:12
21	BY MR. LIN:	03:04:15
22	Q. Printed circuit board earrings?	03:04:15
23	A. Seval left Google several years before	03:04:19
24	Anthony did.	03:04:21
25	No, I was not aware that she had been	03:04:22

1 given circuit board earrings. 03:04:25

2 Q. Why did Seval Oz leave Google? 03:04:30

3 A. She did not perform in her job. I asked 03:04:34

4 her to leave. 03:04:36

5 Q. You fired her? 03:04:37

6 A. Yes. It's possible I didn't actually fire 03:04:38

7 her, but I was certainly involved in the process of 03:04:46

8 her being fired. 03:04:48

9 Q. What time frame was that? 03:04:49

10 A. I don't know. 2013, 2014. 03:04:51

11 Q. Okay. 03:04:56

12 MR. LIN: Counsel, I have no further 03:04:58

13 questions. 03:04:59

14 THE WITNESS: And sorry, may I just 03:05:00

15 clarify? 03:05:01

16 BY MR. LIN: 03:05:02

17 Q. Sure. 03:05:03

18 A. It is possible that we didn't actually 03:05:03

19 fire her, that we had a fork-in-the-road 03:05:05

20 conversation and that she -- now that I think about 03:05:08

21 it, almost certainly she left with severance as 03:05:10

22 opposed to being fired. 03:05:13

23 Q. I understand. 03:05:15

24 And this is within that 2013 time frame 03:05:15

25 that you were talking about? 03:05:17

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1	A. I don't know that -- I don't know which	03:05:18
2	year it was in, but some point in 2013, 2014.	03:05:20
3	Q. Okay.	03:05:23
4	MR. LIN: Thank you.	03:05:25
5	THE WITNESS: Welcome.	03:05:26
6	MR. LIN: Counsel, earlier on in the	03:05:27
7	deposition, Mr. Urmson mentioned that he had seen	03:05:28
8	documents that recollected -- or helped refresh his	03:05:30
9	memory. Would you be able to provide those	03:05:34
10	documents?	03:05:37
11	MR. SINGER: Yeah, they're in our exhibit	03:05:37
12	stack here.	03:05:39
13	MR. LIN: Okay.	03:05:40
14	MR. SINGER: I'll point them out to you	03:05:41
15	guys.	03:05:42
16	MR. LIN: Great. Thank you.	03:05:43
17	THE VIDEOGRAPHER: Okay. We are off	03:05:44
18	record at 3:06 p.m. This concludes today's	03:05:45
19	testimony given by Chris Urmson. Media will be	03:05:48
20	retained by Veritext Legal Solutions. Thank you.	03:05:51
21	MR. LIN: Thank you.	03:05:55
22	(Whereupon, the deposition was	
23	adjourned at 3:06 p.m.)	
24		
25		